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May 6, 1994

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WELL INVESTIGATION PROGRAM - MONADNOCK COMPANY, 18301 ARENTH AVENUE, CITY OF INDUSTRY (FILE NO. 105.0181) (CAO 88-057)

Board staff are in receipt of the "Closure Report on Soil Remediation at the Monadnock Company Facility in City of Industry, California", dated December 15, 1993, prepared by your consultant, ID Environmental Associates (IDEA). The subject report summarizes remediation activities, including in-situ soil vapor extraction, that have been conducted during the past three years at the subject site. We have completed review of the subject report and have the following comments:

1. Results of various environmental assessments from 1986 to 1992 demonstrated elevated concentrations of VOCs in soil, soil vapor and ground water beneath the subject site. Concentrations as high as 50,000 ppbv PCE, 33,000 ppbv TCE and 10,500 ppbv 1,1,1-TCA were detected in soil gas samples from ground surface to ground water, at approximately 30' bgs. Elevated concentrations of cyanide, chromium and cadmium were also detected in soil samples. Amended Cleanup and Abatement Order 88-057 (CAO 88-057), dated September 29, 1989, was issued by the Board requiring remediation of VOC-contaminated soil in the vadose zone that threatens ground water quality below the site.

2. Remediation of VOC contaminated soil was conducted in accordance with Board staff requirements and procedures summarized in the approved "Revised Work Plan to Remediate Soils and Investigate Groundwater Impacted by Volatile Organic Compounds at the Monadnock Company Facility in City of Industry, California", dated October 1992. A vapor extraction system (VES) was used to remediate VOC impacted soils on a phased basis at numerous areas on the subject site for a period of four months from April 1993 to August 1993. Cleanup was demonstrated by achieving influent concentrations of ND or slightly above MCLs for drinking water after several rebound cycles. A confirmation soil boring near the degreaser, the most heavily impacted area, resulted in ND for soil samples collected at 10', 15' and 19' bgs.

3. A total of seven groundwater monitoring wells have been installed on the Monadnock Company property. The wells were sampled quarterly from July 1986 to January 1990, when quarterly monitoring was suspended. The analytical results for ground water samples collected in downgradient wells MW-2, MW-7, MW-8 and MW-11 are generally consistent and demonstrate that elevated concentrations of VOCs (TCE up to 700 µg/l, PCE to 770 µg/l, 1,1-DCE to 840 µg/l), and lesser concentrations of 1,1,1-TCA, were present in groundwater downgradient of VOC-impacted soil areas on the site. Analytical results for upgradient wells MW-1 and MW-4 indicate that minimal concentrations of VOCs (less than 2 µg/l) were present in groundwater entering the site.

4. Based on confirmatory data included in the subject report and previous submissions, board staff concurs that impacted soil that was identified during previous assessments has been remediated to allowable contaminant levels at the subject site. At present, Board staff has no further requirements regarding soil assessment or remediation at the site.

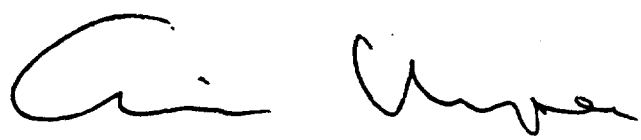
Although no further action is required with regard to soil remediation at the site, groundwater monitoring should resume on a semi-annual basis to characterize current groundwater conditions and determine if remedial actions addressing groundwater cleanup are necessary. This issue was discussed during a meeting between Board staff and TRW representatives on January 19, 1994. Results of previous ground water monitoring at the subject site indicate the ground water contaminant plume that originated on Monadnock property has likely migrated off-site to the west. As part of the initial sampling event, downgradient wells MW-2, MW-3, MW-7, MW-8 and MW-11 must include analyses for cyanide, cadmium and chromium using the appropriate EPA method. Based on the results of the initial analyses, Board staff may discontinue analyses of the inorganic constituents.

Additionally, as required in our letter dated August 3, 1992, and discussed in your work plan dated March 1992, one or more off-site downgradient monitoring well(s) must be installed to assess possible migration of VOC-impacted groundwater from the subject site to adjacent properties. It is our understanding that progress has been made to install a monitoring well on an adjacent property to the west of the subject site. A work plan detailing well construction, development, sampling and laboratory analyses must be submitted for Board staff review and approval before installation of the well(s).

Please provide staff with a proposed ground water monitoring schedule. Board staff must be notified at least three days in advance of all field work at the site. Three copies of the initial monitoring report must be received at the Board on or before June 17, 1994, or upon completion of the off-site monitoring well. Three copies of the required work plan for installation of the off-site monitoring well(s) must be received in a timely manner upon completion of negotiations with the adjacent landowner.

The jurisdictional requirements of other agencies, such as the U. S. Environmental Protection Agency (USEPA), are not affected by the Board's "no further action" determination. Such agencies may choose to make their own determination concerning the site.

Please contact Rick Kaumeyer at (213) 266-7529 if you have any questions and address all correspondence to his attention.



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